



COLORADO
DEPARTMENT
OF HEALTH

July 1, 1991

ROY ROMER
Governor

JOEL KOHN
Interim Executive Director

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Mr. Martin Hestmark
U.S. Environmental Protection Agency
Region VIII
999 18th Street, Suite 500, 8WM-C
Denver, Colorado 80202-2405

**RE: REVIEW AND COMMENT: PHASE I RFI/RI WORKPLAN: WOMAN
CREEK PRIORITY DRAINAGE (OU 5), DRAFT FINAL VERSION, MARCH,
1991**

Dear Mr. Hestmark,

The Colorado Department of Health, Hazardous Materials and Waste Management Division (the Division), has reviewed the above referenced document prepared by DOE and it's prime operating contractor, EG&G. The Division's comments are attached.

The Division is concerned about two items presented by DOE within this RFI/RI Workplan. The first is the continuing misconception that completing each item in Table 5 of the IAG will comprehensively characterize each IHSS within the Operable Unit. We do not believe this to be the case. Additional work is necessary, particularly in the more complex sites like the Old Landfill. Our second concern is the repeated reference to additional phases of RFI/RI work that will be necessary to characterize this OU. At present, no additional work is planned in the IAG schedules. Furthermore, the Division believes that a much better plan for characterization can be formulated by DOE that could obviate the need for future phases of investigation.

If you have any questions regarding these matters, please call Joe Schieffelin of my staff at 331-4421.

Sincerely,

Gary W. Baughman
Unit Leader, Hazardous Waste Facilities
Hazardous Materials and Waste Management Division

ADMIN RECORD

cc: Dan Miller, AGO
Fraser Lockhart, DOE
Tom Olsen, DOE
Tom Greengard, EG&G
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